

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-against-

CHARLIE JAVICE and OLIVIER AMAR,

Defendants.

Case No.: 1:23-cr-00251-AKH

DEFENDANT CHARLIE JAVICE’S NOTICE OF JOINDER

The government continues to violate the Fourth Amendment by the “general, exploratory rummaging” through Ms. Javice’s Google account. *Coolidge v. New Hampshire*, 403 U.S. 443, 467 (1971), *holding modified by Horton v. California*, 496 U.S. 128 (1990); ECF No. 226 at 9–12. “[I]ndiscriminate searches and seizures . . . were the immediate evils that motivated the framing and adoption of the Fourth Amendment[.]” *Payton v. New York*, 445 U.S. 573, 583 (1980). Generalized warrants and indiscriminate searches were and remain “the worst instrument of arbitrary power, the most destructive of . . . liberty, and the fundamental principles of law,” because they place “the liberty of every man in the hands of [law enforcement] officers.” *Stanford v. State of Tex.*, 379 U.S. 476, 481 (1965) (quoting another source). For these reasons, Ms. Javice joins Mr. Amar’s Motion to Suppress Google Drive Materials Seized Pursuant to the Google Warrant. ECF Nos. 225, 226. Ms. Javice respectfully requests the same relief sought in Mr. Amar’s Motion.

The government collected and fished through Ms. Javice’s accounts for more than a year pursuant to the same search warrant as that of Mr. Amar. *Compare* ECF No. 226 at Ex. A with Ex. A, Google Search Warrant 23 MAG 6718, Attach. A, III (Oct. 6, 2023). Indeed, the descriptions of the government’s shifting explanations and scattershot productions, indicative of the pernicious generalized searches prohibited by the Fourth Amendment, apply equally to Ms.

Javice as Mr. Amar, including the production of over 3,700 documents on January 22, 2025 which came from Ms. Javice's Google drive. ECF No. 226 at 6–8.

Ms. Javice respectfully requests the Court grant the Motion to Suppress and grant the same relief to Ms. Javice as is requested by Mr. Amar.

Respectfully submitted,

Dated: January 27, 2025

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CERTIFICATE OF SERVICE

I hereby certify that on January 27, 2025, I caused a copy of the foregoing document to be served via ECF on counsel of record.

By: /s/ Sara C. Clark
Sara. C. Clark